

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

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CHAIM KAPLAN, *et al.*,

Civ. No. 19-03187-BMC

Plaintiffs,

**NOTICE OF MOTION**

-against-

HEZBOLLAH,

Defendant.

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C O U N S E L:

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law, dated May 23, 2021, and the attachments thereto; and upon the pleadings and proceedings heretofore had herein, the plaintiffs will move this Court, at the Courthouse located at 225 Cadman Plaza, Brooklyn, New York, at a date and time to be determined by the Court, or as soon thereafter as counsel can be heard, for an order:

a) ENTERING final judgment by default in the amounts set forth in the annexed Memorandum of Law, against the defendant, Hezbollah, and in favor of plaintiffs Chaim Kaplan, Rivka Kaplan, Brian Erdstein, Karene Erdstein, Mayan Erdstein, Chayim Kumer, Nechama Kumer, Laurie Rappeport, Margalit Rappeport, Theodore Greenberg, Moreen Greenberg, Jared Sauter, Dvora Kaszemacher, Chaya Alkareif, Avishai Reuvane, Elisheva Aron, Yair Mor, and Mikimi Steinberg;

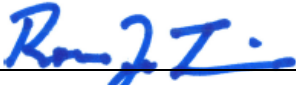
b) ENTERING final judgment DISMISSING the claims of the other plaintiffs; and

c) GRANTING such other and further relief as is just and proper under the circumstances.

Dated: Brooklyn, New York  
May 23, 2021

Respectfully submitted,

THE BERKMAN LAW OFFICE, LLC  
*Attorneys for the Plaintiff*

by:  \_\_\_\_\_  
Robert J. Tolchin

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